

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
CLERK'S OFFICE

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 MODESTO ALEXIS VASQUEZ-SOTO, )  
 Defendant. )

Criminal No.

U.S. DISTRICT COURT  
DISTRICT OF MASS

Motion for Detention Hearing

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156)  
☒ Maximum sentence of life imprisonment or death  
☒ 10 plus years drug offense  
☐ Felony, with two prior convictions in above categories  
☒ Serious risk defendant will flee  
☐ Serious risk of obstruction of justice

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which reasonably will assure (check on or both):

- ☒ Defendant's appearance as required  
☒ Safety of any other person and the community

3. Rebuttable Presumption

The United State (will, ~~will not~~) invoke the rebuttable presumption against defendant pursuant to 18 U.S.C. § 3142(e).  
If "yes," the presumption applies because (check one or both):

X   Probable cause to believe defendant committed 10 plus year drug offense or firearms offense, 18 U.S.C. § 924(c)

       Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests that the Court conduct the detention hearing,

       At first appearance

  X   After continuance of   3   days (not more than 3)

5. Witnesses. The United States intends to call the following witnesses:

Proffer of Assistant U.S. Attorney.

The amount of time for direct examination of these witnesses is estimated to be:       one-half hour.

6. Other Matters.

---

---

Respectfully submitted,

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By: Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney

Dated: March 18, 2004